

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**CONSENT MOTION FOR ENTRY OF A PROTECTIVE ORDER  
GOVERNING DISCLOSURE OF PROTECTED  
IDENTITY, FINANCIAL, CONTACT, HEALTH AND TAX INFORMATION**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, United States hereby moves for entry by this Court of a protective order that will ensure the confidentiality of Protected Identity, Financial, Contact, Health and Tax Information (collectively, “Protected Information”) which is or may be included within the government’s evidence in this case.

Entry of a protective order restricting the use, dissemination and disposition of documents containing Protected Information is essential to permit the United States to provide extensive discovery to the Defendant while protecting the Protected Information of the victims of identity theft in this case. While defense counsel has been offered or given access to these materials, the voluminous nature of discovery in this case weighs heavily in favor of providing counsel with copies of all documents.

The United States and counsel for the Defendant conferred regarding a draft protective order proposed by the United States (the “Government’s Proposed Protective Order”) and have reached an agreement with respect to all of the provisions contained therein.

A copy of the Proposed Protective Order bearing the signatures of counsel to the United States and Defendant is submitted herewith.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

*s/ Tracy Lynn Berry*  
TRACY LYNN BERRY #014753  
Assistant United States Attorney  
111 South 10th Street, Room 20.333  
St. Louis, Missouri 63102  
(314) 539-2200

CERTIFICATE OF SERVICE

Copy of the foregoing was sent through the court's electronic filing system this 26th day of March 2021, to: Lucille G. Liggett, Esq.

s/ Tracy Lynn Berry  
ASSISTANT UNITED STATES ATTORNEY